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DOCKET NO.001US1

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### REMARKS

Entry of this Amendment is believed proper since no new issues are being presented to the Examiner that would require further consideration and/or search.

Claims 14-16, 18-21, 23-25, 27 and 28 are all the claims presently pending in the application. Claims 14, 15 and 27 have been amended to more particularly define the claimed invention. Claims 17, 22 and 29 have been canceled without prejudice or disclaimer.

Applicants specifically state that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claims.

Claims 14-17, 21-25 and 27-29 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Claims 14-17, 21-25 and 27-29 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Warlick et al. (U.S. Patent Application Publication No. 2003/0127342; hereinafter "Warlick"). Claims 14, 16, 17, 21-25, 27 and 29 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Putnam et al. (U.S. Patent Application Publication No. 2004/0248493; hereinafter "Putnam"). Claims 14-17, 21-25, 27 and 29 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Quantrille et al. (U.S. Patent No. 5,431,991; hereinafter "Quantrille"). Claims 14-17, 21-25, 27 and 29 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Cohen et al. (U.S. Patent No. 5,736,473; hereinafter "Cohen"). Claim 28 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Quantrille in view of Meitner et al. (U.S. Patent No. 4,426,417) (hereinafter "Meitner"). Claim 28 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Cohen in view of Meitner. Claims 15 and 28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Putnam.

These rejections are respectfully traversed in the following discussion.

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## **I. THE CLAIMED INVENTION**

The claimed invention of exemplary claim 1 provides a woven/non-woven fabric including fibers consisting of pure cotton (see Application at page 9, lines 1-4). This combination of features provides a fabric that is reusable, tear-resistant when dry or soaked, very high in absorption capacity, ecological and biodegradable (see Application at page 2, lines 10-12).

## **II. THE 35 U.S.C. §112, SECOND PARAGRAPH, REJECTION**

Claims 14-17, 21-25 and 27-29 stand rejected under 35 U.S.C. §112, second paragraph as allegedly being indefinite. The Examiner, however, is clearly incorrect.

That is, the claimed invention is clearly directed to a hydroentangled woven fabric or a hydroentangled non-woven fabric, as is clearly set forth in the claims.

Therefore, the Examiner is respectfully requested to reconsider and withdraw this rejection.

## **III. THE PRIOR ART REJECTIONS**

### **A. The Warlick Reference**

The Examiner alleges that Warlick teaches the claimed invention of claims 14-17, 21-25 and 27-29. Applicants submit, however, that there are features of the claimed invention, which are neither taught nor suggested by Warlick.

That is, Warlick does not teach or suggest "*fibers consisting of pure cotton*", as recited in exemplary claim 14, and similarly recited in claim 27.

The Examiner attempts to rely on the Abstract of Warlick to support his allegations. The Examiner, however, is clearly incorrect.

That is, nowhere in this passage (nor anywhere else for that matter) does Warlick teach or suggest a woven/non-woven fabric including fibers consisting of pure cotton. Indeed, the Examiner does not even suggest that Warlick teaches or suggests this feature.

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Applicants submit that the fabric of the claimed invention is limited to fibers that include only pure cotton. This feature of the claimed invention is not taught or suggested by the cited prior art references.

Therefore, Applicants submit that there are features of the claimed invention that are neither taught nor suggested by the claimed invention. Therefore, the Examiner is respectfully requested to reconsider and withdraw this rejection.

#### **B. The Putnam Reference**

The Examiner alleges that Putnam teaches the claimed invention of claims 14, 16, 17 and 21-27. Furthermore, the Examiner alleges that the claimed invention of claims 15 and 28 would have been obvious in view of Putnam. Applicants submit, however, that there are features of the claimed invention, which are neither taught nor suggested by Putnam.

That is, Putnam does not teach or suggest "*fibers consisting of pure cotton*", as recited in exemplary claim 14, and similarly recited in claim 27.

The Examiner attempts to rely on the Abstract of Putnam to support his allegations. The Examiner, however, is clearly incorrect.

That is, nowhere in this passage (nor anywhere else for that matter) does Putnam teach or suggest a woven/non-woven fabric including fibers consisting of pure cotton. Indeed, the Examiner does not even suggest that Putnam teaches or suggests this feature.

Applicants submit that the fabric of the claimed invention is limited to fibers that include only pure cotton. This feature of the claimed invention is not taught or suggested by the cited prior art references.

Therefore, Applicants submit that there are features of the claimed invention that are neither taught nor suggested by the claimed invention. Therefore, the Examiner is respectfully requested to reconsider and withdraw this rejection.

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**C. The Quantrille Reference**

The Examiner alleges that Quantrille teaches the claimed invention of claims 14-17 and 21-27. Applicants submit, however, that there are features of the claimed invention, which are neither taught nor suggested by Quantrille.

That is, Quantrille does not teach or suggest "*fibers consisting of pure cotton*", as recited in exemplary claim 14, and similarly recited in claim 27.

The Examiner attempts to rely on column 3, lines 32-40 of Quantrille to support his allegations. The Examiner, however, is clearly incorrect.

That is, nowhere in this passage (nor anywhere else for that matter) does Quantrille teach or suggest a woven/non-woven fabric including fibers consisting of pure cotton. Indeed, the Examiner does not even suggest that Quantrille teaches or suggests this feature.

Applicants submit that the fabric of the claimed invention is limited to fibers that include only pure cotton. This feature of the claimed invention is not taught or suggested by the cited prior art references.

Therefore, Applicants submit that there are features of the claimed invention that are neither taught nor suggested by the claimed invention. Therefore, the Examiner is respectfully requested to reconsider and withdraw this rejection.

**D. The Cohen Reference**

The Examiner alleges that Cohen teaches the claimed invention of claims 14-17 and 21-27. Applicants submit, however, that there are features of the claimed invention, which are neither taught nor suggested by Cohen.

That is, Cohen does not teach or suggest "*fibers consisting of pure cotton*", as recited in exemplary claim 14, and similarly recited in claim 27.

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The Examiner attempts to rely on column 9, lines 25-31 of Cohen to support his allegations. The Examiner, however, is clearly incorrect.

That is, nowhere in this passage (nor anywhere else for that matter) does Cohen teach or suggest a woven/non-woven fabric including fibers consisting of pure cotton. Indeed, the Examiner does not even suggest that Cohen teaches or suggests this feature.

Applicants submit that the fabric of the claimed invention is limited to fibers that include only pure cotton. This feature of the claimed invention is not taught or suggested by the cited prior art references.

Therefore, Applicants submit that there are features of the claimed invention that are neither taught nor suggested by the claimed invention. Therefore, the Examiner is respectfully requested to reconsider and withdraw this rejection.

#### **E. The Meitner Reference**

The Examiner alleges that Meitner would have been combined with Quantrille to teach the claimed invention of claim 28. Furthermore, the Examiner alleges that Meitner would have been combined with Cohen to teach the claimed invention of claim 28. Applicants respectfully submit, however, that, even if combined, the alleged combination of references would not teach or suggest each and every feature of the claimed invention.

That is, neither Quantrille, Cohen, Evans nor Meitner, nor any combination thereof, teaches or suggests "*fibers consisting of pure cotton*", as recited by exemplary claim 14, and similarly recited in claim 27.

Applicants have provided traversal arguments above (e.g., see sections C and D above), which clearly explain that this feature is not taught or suggested by Quantrille nor Cohen. The above traversal arguments are incorporated herein.

Furthermore, Applicants submit that Meitner does not make up the deficiencies of Quantrille nor Cohen.

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Indeed, the Examiner attempts to rely on the Abstract and Table 1 of Meitner to support his allegations. The Examiner, however, is clearly incorrect.

That is, nowhere in the Abstract nor Table 1 (nor anywhere else for that matter) does Meitner teach or suggest a woven/non-woven fabric including fibers consisting of pure cotton. Indeed, the Examiner does not even allege that Meitner teaches or suggests this feature. The Examiner merely relies on Meitner as teaching staple fibers having a thickness in range of 1 mm to 10 mm.

Thus, Meitner fails to make up the deficiencies of Quantrille, Cohen and Evans.

Therefore, Applicants respectfully submit that, even if combined, the alleged combination of references does not teach or suggest each and every feature of the claimed invention. Therefore, the Examiner is respectfully requested to reconsider and withdraw this rejection.

#### IV. FORMAL MATTERS AND CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully submit that claims 14-25 and 27-29, all the claims presently pending in the Application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the Application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.


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The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date: October 4, 2006

  
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**FACSIMILE TRANSMISSION**

I hereby certify that I am filing this paper via facsimile, to Group Art Unit 1771, at (571) 273-8300, on October 4, 2006.

Respectfully Submitted,

Date: October 4, 2006

  
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